



Greater  
Edwards  
Aquifer  
Alliance

January 9, 2005

Surface Transportation Board  
Case Control Unit  
Washington, DC 20423

ET-1319

Attn: Rini Ghosh  
Re: STB Docket No. FD 34284

Dear Ms. Ghosh and members of the Surface Transportation Board,

I am submitting these comments on behalf of the Greater Edwards Aquifer Alliance, a coalition of sixteen member groups from throughout the Edwards Aquifer Region. The Greater Edwards Aquifer Alliance (GEAA) is a non-profit organization whose mission is to promote effective broad based grassroots advocacy for conservation and sustainable management of the Edwards Aquifer Ecosystem throughout the twenty-one county Edwards region.

The Surface Transportation Board (STB) has recognized the Southwestern Gulf Railroad Company (SGR) as a "common carrier" and has thus accorded the rights of condemnation through eminent domain for construction of the seven-mile rail line to connect the Vulcan Materials Company (Vulcan) quarry project with an existing Union Pacific Railroad Company line. The draft Environmental Impact Statement (EIS) compiled by the Section of Environmental Analysis (SEA) does not include a cumulative impact study of uses other than those proposed to serve the Vulcan Materials Company. The draft EIS states in section ES1.1 that "SGR would also hold itself out as a common carrier and provide service to other industries that might locate in the area in the future." Yet, no impacts of such "other industries" are addressed in this document.

Section ES 2.0 "Description of Proposed Action" confines itself to a description of the proposed SGR that only includes use of this line by Vulcan. All studies contained in the draft EIS pertain exclusively to the impacts from activities serving Vulcan. Should the STB maintain the fiction that the SGR is a "common carrier", the cumulative impacts of rail traffic through the proposed routes should include projections of uses by "other industries".

GEAA objects to the fiction that SGR is a "common carrier" and most strenuously objects to STB granting governmental powers of condemnation to a project that is

clearly designed to serve one industry for one purpose. If other industries will be served by this line, a cumulative impact study should be required as part of this draft EIS that will address the impacts from these additional uses. In that the SGR project would have serious environmental, cultural, and economic impacts to the private property traversed by the proposed routes, as well as to the community of Quihi as a whole, GEAA recommends the No-Action Alternative be adopted by STB regarding this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Annalisa Peace". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Annalisa Peace  
Development and Outreach Coordinator  
Greater Edwards Aquifer Alliance

Member Groups

Alamo Group of the Sierra Club  
Aquifer guardians in Urban Areas (AGUA)  
Austin Regional Sierra Club  
Bexar County Green Party  
Hays CAN (Community Action Network)  
Helotes Heritage Association  
Medina County Environmental Action Association, Inc.  
San Antonio Conservation Society  
San Geronimo Watershed Alliance  
San Marcos River Foundation  
Save Barton Creek Association  
Save Our Springs Alliance  
Smart Growth San Antonio  
Sustainable Energy and Economic Development (SEED) Coalition  
Wimberley Valley Watershed Association  
West Texas Springs Alliance